

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>DONALD MICHAEL OUTLAW</b>	:	
	:	
v.	:	NO. 21-1290
	:	
<b>CITY OF PHILADELPHIA, JEFFREY PIREE and HOWARD PETERMAN</b>	:	
	:	

**PLAINTIFF’S RESPONSE TO CLARIFY DEFENDANTS’ MOTION FOR LEAVE**

Plaintiff submits this brief Response to Defendants’ Motion to Depose Charles Paladino, an Incarcerated Individual and to clarify Defendants’ statements in their Motion:

1. Mr. Paladino was deposed by counsel for Plaintiff on March 31, 2022, but the deposition was not completed, as Mr. Paladino ended the deposition.

2. The remainder of Plaintiff’s deposition of Mr. Paladino’s was rescheduled by agreement for April 5, 2022.

3. On April 5, 2022, Mr. Paladino appeared in person to continue his deposition at The Heritage Hills Golf Resort in York, Pennsylvania.

4. After the conclusion of Plaintiff’s counsel’s questioning, counsel for Defendants questioned Mr. Paladino for nearly two (2) hours until shortly before 2:16 p.m. on April 5, 2022.

5. Prior to the conclusion at 2:16 p.m. on April 5, 2022, counsel had a discussion off the record wherein Ms. Rosenthal indicated a desire to bring Mr. Paladino back for a deposition pursuant to Defendants’ subpoena.

6. Mr. Paladino’s deposition, pursuant to the Defendants’ subpoena, was scheduled for May 9, 2022. Mr. Paladino contacted Defense counsel in the early morning hours of May 9<sup>th</sup> to report a medical issue and stated that he was unable to attend the deposition. Defense counsel

failed to check her messages until the deposition was set to begin and, as a result, both parties traveled to York, Pennsylvania.

7. Defense counsel requested, due to their calendar and that of the witness, that the deposition be continued to a Saturday. Plaintiff's counsel agreed as a courtesy and Mr. Paladino's deposition was re-scheduled for Saturday, June 4, 2022. Mr. Paladino notified Defense counsel of another medical issue that prevented his appearance on June 4, 2022.

8. On June 7, 2022, Defense counsel was in contact with Mr. Paladino and additional dates of June 15, 2022, and June 17, 2022, were proposed. See email dated June 7, 2022, attached as **Exhibit A**.

9. On June 10, 2022, Defense counsel indicated that Mr. Paladino was available to be deposed on June 17, 2022. Plaintiff counsel agreed to the proposed date.

10. On June 15, 2022, Defense counsel, after a meet and confer, sent a proposed list of scheduling dates for various witnesses, and proposed to depose Mr. Paladino on June 23, 2022. See email dated June 15, 2022, attached as **Exhibit B**.

11. June 16, 2022, Plaintiff's counsel confirmed availability for the June 23, 2022, deposition of Mr. Paladino.<sup>1</sup>

12. On June 22, 2022, Plaintiff's counsel followed up with Defense counsel asking about the status of Mr. Paladino's deposition but was informed that she had "went ahead with scheduling trial preparations for this Thursday in another matter". See email dated June 22, 2022 (**Exhibit B**).

13. On June 22, 2022, in another response on the same email chain, Defense counsel indicated she would have to get back to us regarding coordinating Mr. Paladino's deposition. Id.

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<sup>1</sup> Similar to the recent filing, Defense counsel afforded Plaintiff's counsel very little time to rearrange calendars and/or confirm availability.

14. On July 5, 2022, after another meet and confer, Plaintiff's counsel emailed Defense counsel to again inquire as to the status of Mr. Paladino's deposition and that we were holding a date to complete the deposition. See email dated July 5, 2022, attached as **Exhibit C**.

15. Defense counsel's response was that Mr. Paladino's deposition was in fact never "scheduled". Id.

16. From July 5, 2022, until July 22, 2022, Plaintiff's counsel has not been informed of any attempts to locate or contact Mr. Paladino by defense.

17. Defendants acknowledge that they were aware of Mr. Paladino's incarceration by July 22, 2022, but did not seek leave to depose him until August 2, 2022. Mr. Paladino's deposition was then scheduled for August 25, 2022.

18. Prior to the deposition of Mr. Paladino on August 25, 2022, Defense counsel was made aware that he was transferred to another facility.

19. Plaintiff's counsel has been more than accommodating and has even made themselves available on the weekend, as well as shifting other responsibilities and following up with Defense counsel as to the status of the deposition that they wanted.

20. Defendants have had ample time to depose Mr. Paladino and, while indeed they have undertaken diligent efforts recently to obtain his presence, there are significant gaps in time when apparently nothing was done to secure his testimony.

21. The deposition of Mr. Paladino after the discovery deadline will prejudice Plaintiff, as the deadline for his expert reports is September 13, 2022. Plaintiff's experts will need to review and incorporate any testimony into their analysis.

22. Plaintiff acknowledges that Defendants had a right to depose Mr. Paladino, however, it does not appear that their claim that he is the "most important third party witness" is

commensurate with their efforts over the course of the litigation to secure his presence at deposition.

23. Plaintiff does not desire any deadline to be extended and if the Court grants Defendants' Motion, counsel for Plaintiff will, of course, make themselves available.

Respectfully submitted,

**VSCPLAW** VAN NAARDEN • SPIZER  
CHASE • PINTO

*Julia Ronnebaum*

JOSHUA VAN NAARDEN, ESQUIRE

JULIA RONNEBAUM, ESQUIRE

Two Commerce Square

2001 Market Street, Suite 3700

Philadelphia, PA 19103

TEL: 215-960-0000

FAX: 215-960-0384

*Attorneys for Plaintiff*

Dated: August 26, 2022

**CERTIFICATE OF SERVICE**

I, Valerie A. Wilus, Paralegal to Julia Ronnebaum, Esquire, hereby certify that I caused a true and correct copy of Plaintiff's Response to Clarify Defendants' Motion for Leave be served upon the following persons listed below via email:

Danielle B. Rosenthal, Esquire  
Katelyn Mays, Esquire  
City of Philadelphia – Solicitor Office  
1515 Arch Street, 14<sup>th</sup> Floor  
Philadelphia, PA 19102  
[danielle.rosenthal@phila.gov](mailto:danielle.rosenthal@phila.gov)  
[Katelyn.mays@phila.gov](mailto:Katelyn.mays@phila.gov)

*Attorneys for Defendants*

**VSCPLAW** VAN NAARDEN • SPIZER  
CHASE • PINTO

*Valerie A. Wilus*

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VALERIE A. WILUS

Dated: August 26, 2022

**EXHIBIT A**

## Valerie Wilus

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**Subject:** FW: Paladino Deposition

**AttachToSmartAdvocateNumber:**  
174438493

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**From:** Joshua VanNaarden <[JVanNaarden@vscplaw.com](mailto:JVanNaarden@vscplaw.com)>  
**Sent:** Tuesday, June 7, 2022 12:44 PM  
**To:** Danielle Rosenthal <[Danielle.Rosenthal@phila.gov](mailto:Danielle.Rosenthal@phila.gov)>  
**Cc:** Julia Ronnebaum <[jronnebaum@VSCPLAW.Com](mailto:jronnebaum@VSCPLAW.Com)>  
**Subject:** Re: Paladino Deposition

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We need to have a discussion about what additional deps are needed by both parties before we confirm any additional dates. I suggest that we all get on a call before hearing on Monday and discuss this. Since Danielle Walsh is also involved with taking depositions - she should probably also attend to the extent possible (I know she was dealing with COVID).

**Joshua Van Naarden, Esq.**  
*Founding Partner*

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office [215.960.0000](tel:215.960.0000)  
direct [215.960.0399](tel:215.960.0399) fax [215.960.0384](tel:215.960.0384)  
[jvannaarden@vscplaw.com](mailto:jvannaarden@vscplaw.com)  
[www.vscplaw.com](http://www.vscplaw.com)

On Jun 7, 2022, at 12:34 PM, Danielle Rosenthal <[Danielle.Rosenthal@phila.gov](mailto:Danielle.Rosenthal@phila.gov)> wrote:

Josh -

I finally got in touch with Mr. Paladino. He is now laid off so we don't have to do it on a weekend. I am still amenable to doing it on Zoom since that's easier for him and us as well.

He is going to check about his child's doctor's appointments and get back to me about whether he can do the 15th or the 17th of June. Hopefully those dates work for you? If not, please let me know ASAP so I can tell him.

Danielle

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**EXHIBIT B**

## Valerie Wilus

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**Subject:** FW: Outlaw v. City of Philadelphia et al. Paladino Dep

**AttachToSmartAdvocateNumber:**

368486119

**SA:** -1

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**From:** Danielle Rosenthal <[Danielle.Rosenthal@phila.gov](mailto:Danielle.Rosenthal@phila.gov)>

**Sent:** Wednesday, June 22, 2022 11:33 AM

**To:** Julia Ronnebaum <[jronnebaum@VSCPLAW.Com](mailto:jronnebaum@VSCPLAW.Com)>

**Cc:** Valerie Wilus <[VWilus@vscplaw.com](mailto:VWilus@vscplaw.com)>; Joshua VanNaarden <[JVanNaarden@vscplaw.com](mailto:JVanNaarden@vscplaw.com)>

**Subject:** RE: Outlaw v. City of Philadelphia et al. Paladino Dep

Julia –

I am sorry if you took offense to my response to your email. I simply raised the conflict in explaining to Josh yesterday that Paladino would not be deposed on Thursday. I also did not have sufficient time at the point I heard from you to arrange for a process server in sufficient time and also coordinate Mr. Paladino's deposition. I do apologize if this was an inconvenience for you.

I need to look at the calendar since some juggling needs to happen to reschedule Monique as well, since she is only available Fridays and I will be out-of-office on July 8<sup>th</sup>. Again, I am juggling a number of competing things, but I hope to get back to you either today or tomorrow on outstanding emails.

Danielle

---

**From:** Julia Ronnebaum <[jronnebaum@VSCPLAW.Com](mailto:jronnebaum@VSCPLAW.Com)>

**Sent:** Wednesday, June 22, 2022 11:27 AM

**To:** Danielle Rosenthal <[Danielle.Rosenthal@phila.gov](mailto:Danielle.Rosenthal@phila.gov)>

**Cc:** Valerie Wilus <[VWilus@vscplaw.com](mailto:VWilus@vscplaw.com)>; Joshua VanNaarden <[JVanNaarden@vscplaw.com](mailto:JVanNaarden@vscplaw.com)>

**Subject:** RE: Outlaw v. City of Philadelphia et al. Paladino Dep

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Danielle, your choice to schedule something else in that time period is obviously your prerogative, but rescheduling the dep has nothing to do with the timing of my response. Your initial email was sent after 5:00 pm and did not provide any "deadline" to respond to you before you filled your calendar with other events. You indicated your intention to speak with Mr. Paladino the same evening that you sent the original email, although your email below suggests that you may have waited until the next day to call him. Regardless, the urgency of your internal calendar was not communicated to us.

As you can surely imagine, we have made many efforts behind the scenes to accommodate deposition dates for you. Going forward, we ask that you let us know when you have scheduled over the proposed dates held in our calendars so that we may repurpose those dates, too.

We will work with you to find another date for his dep, but please provide some availability now so that we can lock in that date.

Thank you,

Julia Huxman Ronnebaum, Esq.

*Associate*

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[jronnebaum@vscplaw.com](mailto:jronnebaum@vscplaw.com)

[www.vscplaw.com](http://www.vscplaw.com)

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---

**From:** Danielle Rosenthal <[Danielle.Rosenthal@phila.gov](mailto:Danielle.Rosenthal@phila.gov)>

**Sent:** Wednesday, June 22, 2022 10:27 AM

**To:** Julia Ronnebaum <[jronnebaum@VSCPLAW.Com](mailto:jronnebaum@VSCPLAW.Com)>

**Cc:** Valerie Wilus <[VWilus@vscplaw.com](mailto:VWilus@vscplaw.com)>; Joshua VanNaarden <[JVanNaarden@vscplaw.com](mailto:JVanNaarden@vscplaw.com)>

**Subject:** RE: Outlaw v. City of Philadelphia et al. Paladino Dep

Julia –

I don't believe there was any confusion. I had hoped to hear from you that night or early the next morning to call Paladino. I had not, and in the meantime, went ahead with scheduling trial preparation sessions for this Thursday in another matter, where trial commences on Monday. Given that, I will need to look at my calendar and find another date.

I know that we have several outstanding email chains that I need to circle back on, including that one, and hope to do that today or tomorrow by the latest. I had back to back meetings on Friday morning/early afternoon (I only in for a half day, as I mentioned due to a commitment) and with the deposition yesterday, I am a bit behind on my email.

Danielle

---

**From:** Julia Ronnebaum <[jronnebaum@VSCPLAW.Com](mailto:jronnebaum@VSCPLAW.Com)>

**Sent:** Wednesday, June 22, 2022 10:21 AM

**To:** Danielle Rosenthal <[Danielle.Rosenthal@phila.gov](mailto:Danielle.Rosenthal@phila.gov)>

**Cc:** Valerie Wilus <[VWilus@vscplaw.com](mailto:VWilus@vscplaw.com)>; Joshua VanNaarden <[JVanNaarden@vscplaw.com](mailto:JVanNaarden@vscplaw.com)>

**Subject:** RE: Outlaw v. City of Philadelphia et al. Paladino Dep

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Good morning, Danielle,

I understand that there was some confusion about whether I responded to your request to depose Mr. Paladino on June 23rd (tomorrow). Please see the email chain below – I responded with our availability the next day and confirmed that the 23rd does work for us. We are still available tomorrow, so please let us know whether you intend to go forward with this dep so that we may plan accordingly.

Thanks,

Julia Huxman Ronnebaum, Esq.

*Associate*

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**From:** Julia Ronnebaum

**Sent:** Thursday, June 16, 2022 6:43 PM

**To:** Danielle Rosenthal <[Danielle.Rosenthal@phila.gov](mailto:Danielle.Rosenthal@phila.gov)>; Joshua VanNaarden <[JVanNaarden@vscplaw.com](mailto:JVanNaarden@vscplaw.com)>

**Cc:** Valerie Wilus <[VWilus@vscplaw.com](mailto:VWilus@vscplaw.com)>; Danielle Walsh <[Danielle.Walsh@phila.gov](mailto:Danielle.Walsh@phila.gov)>

**Subject:** RE: Outlaw v. City of Philadelphia et al.

In follow up to your email below, June 23, works for us to re- schedule Paladino's dep. Additionally, I forgot to mention during our call yesterday that Monique's dep does still need to be on a Friday due to her work schedule. Could we do July 8<sup>th</sup>?

Julia Huxman Ronnebaum, Esq.

*Associate*

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[www.vscplaw.com](http://www.vscplaw.com)

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---

**From:** Danielle Rosenthal <[Danielle.Rosenthal@phila.gov](mailto:Danielle.Rosenthal@phila.gov)>

**Sent:** Wednesday, June 15, 2022 5:14 PM

**To:** Julia Ronnebaum <[jronnebaum@VSCPLAW.Com](mailto:jronnebaum@VSCPLAW.Com)>; Joshua VanNaarden <[JVanNaarden@vscplaw.com](mailto:JVanNaarden@vscplaw.com)>

**Cc:** Valerie Wilus <[VWilus@vscplaw.com](mailto:VWilus@vscplaw.com)>; Danielle Walsh <[Danielle.Walsh@phila.gov](mailto:Danielle.Walsh@phila.gov)>

**Subject:** Outlaw v. City of Philadelphia et al.

**Importance:** High

Julia and Josh:

Here is my understanding of what we discussed in today's meet-and-confer in our efforts to nail down the deposition schedule based on your 6/14/22 correspondence:

- June 21, 2022 – Alston (see my correspondence to Josh about scheduling his testimony, w/ break to accommodate my attachment for a pretrial conference before Judge Strawbridge)
- June 24, 2022 – Eric Lee
- July 5, 2022 – Jibrail Jones (half day)
- July 6, 2022 – Monique Solomon Outlaw (based on your confirmation with her. Note that we are moving her deposition from next week to allot time for my review of an additional substantial production that you expect to provide today)
- July 22, 2022 – Donald Outlaw
- July 26, 2022 – Katima Jackson
- July 28, 2022 – Christopher Holder
- July 29, 2022 – Lamar Rodgers
- August 8, 2022 – Wesley Harmon
- August 9, 2022 – Inspector Healy
- August 11, 2022 – Tentative date for Boyle pending health update
- August 17, 2022 – Lemuel Barr

With respect to Deegan, you will work that out with Danielle Walsh to reschedule and cc me on the correspondence.

Now that I looked at the schedule, I would propose **scheduling Paladino on June 23, 2022**. Does that work for you?

As to the scope of remaining noticed depositions, we discussed that my clients continue to take the same position as to the number of depositions and who we are each respectively noticing based on the April 1, 2022 filing. At this point, you are inclined not to press the issue, but we agreed that, in the event you change your mind, you will provide me with notice prior to raising it at a future status conference with the Court.

Please let me know if I missed anyone or if your notes about dates differ. I would also like to call Paladino today so let me know if you are amenable to taking his deposition on 6/23.

Julia, please also let me know when we can meet and confer regarding the outstanding issues with respect to your productions raised in my emails and our prior meet-and-confers.

Danielle

**Danielle B. Rosenthal** | Deputy City Solicitor

City of Philadelphia Law Department

1515 Arch Street, 14<sup>th</sup> Floor

Philadelphia, PA 19102-1595

(215) 683-5448 (phone)

[danielle.rosenthal@phila.gov](mailto:danielle.rosenthal@phila.gov)

pronouns: she/her/hers

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**EXHIBIT C**

## Valerie Wilus

---

**Subject:** FW: Jibrail Jones Deposition

**AttachToSmartAdvocateNumber:**

287304760

**SA:** -1

---

**From:** Danielle Rosenthal <[Danielle.Rosenthal@phila.gov](mailto:Danielle.Rosenthal@phila.gov)>

**Sent:** Tuesday, July 5, 2022 3:45 PM

**To:** Julia Ronnebaum <[jronnebaum@VSCPLAW.Com](mailto:jronnebaum@VSCPLAW.Com)>

**Cc:** Katelyn Mays <[Katelyn.Mays@phila.gov](mailto:Katelyn.Mays@phila.gov)>; Joshua VanNaarden <[JVanNaarden@vscplaw.com](mailto:JVanNaarden@vscplaw.com)>; Valerie Wilus <[VWilus@vscplaw.com](mailto:VWilus@vscplaw.com)>

**Subject:** RE: Jibrail Jones Deposition

Julia –

I tried to get in touch with Paladino several times to schedule the dep for Wednesday, and was unable to reach him to do so. I cannot control his schedule - he is a third party witness. I am unsure what you mean a unilateral decision to cancel a deposition. The deposition was never “scheduled.” Also, Mr. Paladino is located out of town and I need several days to obtain a process server to serve him. I am continuing to try to get in contact with him about scheduling a date. So far, I have not been successful. He has said he would call me and has not.

Danielle

---

**From:** Julia Ronnebaum <[jronnebaum@VSCPLAW.Com](mailto:jronnebaum@VSCPLAW.Com)>

**Sent:** Tuesday, July 5, 2022 3:36 PM

**To:** Danielle Rosenthal <[Danielle.Rosenthal@phila.gov](mailto:Danielle.Rosenthal@phila.gov)>

**Cc:** Katelyn Mays <[Katelyn.Mays@phila.gov](mailto:Katelyn.Mays@phila.gov)>; Joshua VanNaarden <[JVanNaarden@vscplaw.com](mailto:JVanNaarden@vscplaw.com)>; Valerie Wilus <[VWilus@vscplaw.com](mailto:VWilus@vscplaw.com)>

**Subject:** RE: Jibrail Jones Deposition

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Danielle, on Friday during our meet and confer, I told you that we were holding Wednesday for Paladino’s dep. So, we are available tomorrow for Mr. Jones’ dep if you wish to proceed with the rearrangements you’ve made over the weekend. However, cancelling Paladino’s dep again is a unilateral decision by you. Perhaps you have changed your mind about deposing him altogether, but please be advised that if you intend to reschedule his dep again, we cannot agree to use up any of the four remaining August dates for Paladino until we get Lt. Deegan’s dep scheduled. I sent an email on that point to Danielle Walsh earlier this morning and copied you.

Here’s our calendar of the upcoming depositions – would you please confirm that we are on the same page regarding remaining scheduling before you are out of the office for couple weeks:

- July 6, 2022 – Jabil Jones
- July 22, 2022 – Monique Solomon Outlaw
- July 26, 2022 – Donald Outlaw



- July 28, 2022 – Christopher Holder
- July 29, 2022 – Lamar Rodgers
- August 2, 2022 – Katima Jackson
- August 8, 2022 – Wesley Harmon
- August 9, 2022 – Inspector Healy
- August 11, 2022 – Det. Boyle
- August 17, 2022 – Lemuel Barr

Thank you,

Julia Huxman Ronnebaum, Esq.

*Associate*

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---

**From:** Danielle Rosenthal <[Danielle.Rosenthal@phila.gov](mailto:Danielle.Rosenthal@phila.gov)>  
**Sent:** Sunday, July 3, 2022 12:32 PM  
**To:** Joshua VanNaarden <[JVanNaarden@vscplaw.com](mailto:JVanNaarden@vscplaw.com)>; Julia Ronnebaum <[jronnebaum@VSCPLAW.Com](mailto:jronnebaum@VSCPLAW.Com)>  
**Cc:** Katelyn Mays <[Katelyn.Mays@phila.gov](mailto:Katelyn.Mays@phila.gov)>  
**Subject:** Jibrail Jones Deposition  
**Importance:** High

Hi –

Mr. Jones just called me. Tuesday is not available for him, but he is able to be deposed the following day on Wednesday at 2:30 pm at your offices. I will have a new subpoena issued.

Danielle

Danielle B. Rosenthal | Deputy City Solicitor  
City of Philadelphia Law Department  
1515 Arch Street, 14<sup>th</sup> Floor  
Philadelphia, PA 19102-1595  
(215) 683-5448 (phone)  
[danielle.rosenthal@phila.gov](mailto:danielle.rosenthal@phila.gov)  
pronouns: she/her/hers

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